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January 31, 2018

BY ECF

Hon. Elizabeth S. Stong, U.S.B.J.
U.S. Bankruptcy Court, EDNY
Conrad B. Duberstein Courthouse
271-C Cadman Plaza East - Suite 1595
Brooklyn, New York 11201-1800

Re: In re: G.A.F. Seelig, Inc. ("Debtor")
Chapter 11 case
Case No. 17-46968 (ESS)

Dear Judge Stong:

As Your Honor is aware, this firm represents Dairyland USA Corporation ("Buyer"). Following the telephonic status conference held earlier this afternoon, we conferred with the Buyer regarding the newly scheduled hearing date of Tuesday, February 6, 2018, for the sale hearing concerning the private sale to the Buyer in this case. The Buyer has advised that the business of the Debtor has, in its view, significantly deteriorated over the past week and that the value of the business will be irreparably harmed if the sale hearing does not take place on this Friday, February 2, 2018, as originally contemplated.

Importantly, the delay of the sale hearing to next Tuesday will result in more than just a two-business day delay. Logistically, to avoid interference with the Buyer's existing operations, and given the nature of dairy products and the cumbersome delivery process involved in transporting dairy, the closing of the sale must take place over a weekend. Not holding the sale hearing this Friday means that the sale cannot close this coming weekend, and the closing and subsequent effort to integrate the acquired assets will need to take place the following weekend. Thus, another week will have been lost, and it is the Buyer's position that the value of the Debtor's business is decreasing every day.

It is the Buyer's understanding that, just this past week, the Debtor has lost accounts valued at approximately \$10 million of annual revenue, approximately 20% of the Debtor's business. Thus, it is the Buyer's view that value is lost every day that passes. In addition, it is the Buyer's understanding that certain sales representatives (who are no longer working for with the Debtor and who will not work for the Buyer) may be actively trying to disrupt the Debtor's remaining customer relationships. Under these exigent circumstances, the Buyer respectfully submits that delaying the sale hearing until next Tuesday will doom the proposed transaction to such an extent that the Buyer would not be willing to proceed with the sale transaction at that point.

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As such, we respectfully request that if there is any way to schedule the sale hearing for this Friday, that the hearing be so scheduled, so that the sale transaction be permitted to close this weekend. Absent a hearing this Friday, February 2, 2018, the Buyer will find itself in the regrettable position of having to withdraw its offer.

We have consulted with counsel for the Debtor and the United States Trustee, who are each available to attend the sale hearing this Friday, February 2, 2018.

Importantly, the Debtor supports the relief requested in this letter and also seeks to schedule the sale hearing this Friday, February 2, 2018. We are available for an emergency conference at the Court's convenience to answer any questions that the Court may have.

Respectfully submitted,

/s/ Nava Hazan

NAVA HAZAN